

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

DEANDRE CRAWFORD, )  
 )  
 Plaintiff, ) Case No: 18-cv-4882  
 v. ) Hon. Mary M. Rowland  
 CHARLES BEST, *et al.*, )  
 )  
 Defendants. )

**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO FILE A  
DISPOSITIVE MOTION OR STIPULATED DISMISSAL**

Defendants Marc Anastacio, Lt. Bennett, Ralph Burkybile, Brett Carnahan, Tanesha Carroll, Jermiagh Daly, Brian Givens, Brian Heplin, Randy Pfister, Terrence Ragusa, and Christopher Whitfield, by and through their attorney, Illinois Attorney General Kwame Raoul, and for their Motion for an Extension of Time to File a Dispositive Motion or Stipulated Dismissal, state the following:

1. On November 10, 2021, the Parties jointly moved to extend the dispositive motion briefing schedule with the Defendants to file their dispositive motions by December 10, 2021. [ECF #122].
2. The Parties requested this extension to provide additional time to negotiate a potential settlement agreement. *Id.*
3. The Parties have worked diligently to procure an agreement, with Plaintiff's counsel emailing and calling undersigned counsel on several occasions.

4. Unfortunately, Defendants require an additional extension to confer with his clients.

5. Thus, the Defendants hereby move for an extension of time to either file a stipulated dismissal once settlement is completed or alternatively, to move for summary judgment by February 4, 2021.

6. This extension will promote judicial efficiency and avoid the undue costs of preparing motions for summary judgment, by potentially allowing the Parties to resolve this case through settlement.

WHEREFORE, Defendants Marc Anastacio, Lt. Bennett, Ralph Burkybile, Brett Carnahan, Tanesha Carroll, Jermiagh Daly, Brian Givens, Brian Heplin, Randy Pfister, Terrence Ragusa, and Christopher Whitfield, respectfully request that this Honorable Court extend the deadline for dispositive motions to February 4, 2021, to allow additional time to pursue settlement.

Dated: December 21, 2021

Respectfully submitted by,

Kwame Raoul  
Illinois Attorney General

*/s/ Jonathan C. Kangwa*  
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